

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel.)
W. A. DREW EDMONDSON, in his capacity as)
ATTORNEY GENERAL OF THE STATE OF)
OKLAHOMA and OKLAHOMA SECRETARY)
OF THE ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the TRUSTEE FOR NATURAL)
RESOURCES FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

05-CV-0329 TCK-SAJ

TYSON FOODS, INC., TYSON POULTRY, INC.,)
TYSON CHICKEN, INC., COBB-VANTRESS, INC.,)
AVIAGEN, INC., CAL-MAINE FOODS, INC.,)
CAL-MAINE FARMS, INC., CARGILL, INC.,)
CARGILL TURKEY PRODUCTION, LLC,)
GEORGE’S, INC., GEORGE’S FARMS, INC.,)
PETERSON FARMS, INC., SIMMONS FOODS, INC.,)
and WILLOW BROOK FOODS, INC.,)

Defendants.)

**MOTION FOR ADMISSION OF ERIN W. THOMPSON
AS COUNSEL PRO HAC VICE**

Defendants, Tyson Foods, Inc., Tyson Chicken, Inc., Tyson Poultry, Inc. and Cobb-Vantress, Inc. (collectively “Tyson”), by their attorneys, Ryan, Whaley & Coldiron, P.C., pursuant to LcvR 83.2(g) and 83.3 move this Court for the admission of Erin W. Thompson to appear *pro hac vice* in this case as out-of-state counsel for Tyson. In support of this motion, Tyson would show the following:

1. The undersigned, Paula M. Buchwald, is counsel of record for Defendants, Tyson Foods, Inc., Tyson Chicken, Inc., Tyson Poultry, Inc., and Cobb-Vantress, Inc. in these proceedings. Paula M. Buchwald will continue to serve as counsel for Defendant Tyson in these proceedings.

2. Pursuant to LcvR 83.2(g), attached to this Motion as Exhibit 1 is the completed request form of Erin W. Thompson.

3. Erin W. Thompson is a member in good standing of the bar of Arkansas. *See* Exhibit 2.

4. The proposed admittee understands that, upon admission *pro hac vice*, she shall be subject to the disciplinary jurisdiction of this Court.

5. The proposed admittee understands that admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.

6. Submitted simultaneously with the filing of this motion is tender of the required \$75.00 fee to the Clerk of this Court.

WHEREFORE, Defendants, Tyson Foods, Inc., Tyson Chicken, Inc., Tyson Poultry, Inc., and Cobb-Vantress, Inc. respectfully request that this Court grant this application for out-of-state attorney Erin W. Thompson to appear *pro hac vice* before this Court on behalf of Defendants Tyson Foods, Inc., Tyson Chicken, Inc., Tyson Poultry, Inc., and Cobb-Vantress, Inc. and enter the proposed Order submitted contemporaneously herewith.

Respectfully submitted,

By /s/ Paula M. Buchwald

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**COUNSEL FOR DEFENDANTS TYSON
FOODS, INC., TYSON CHICKEN, INC., TYSON
POULTRY, INC. and COBB-VANTRESS, INC.**

CERTIFICATE OF SERVICE

I certify that on the 18th day of January 2007, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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I also hereby certify that I served the attached documents by United States Postal Service, proper postage paid, on the following who are not registered participants of the ECF System:

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Secretary of the Environment
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Oklahoma City, OK 73118
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/s/ Paula M. Buchwald
Paula M. Buchwald